

REMARKS

This Application has been carefully reviewed in light of the Final Office Action mailed August 31, 2005 (the "Office Action"). At the time of the Office Action, Claims 1-16 were pending in the Application. The Examiner rejected Claims 1-16. Applicants respectfully request reconsideration and allowance of all pending claims

Rejections Under 35 U.S.C. §102(e)

Claims 1-16 were rejected under 35 U.S.C. § 102(e), as being anticipated by U.S. Patent No. 6,038,597 issued to Van Wyngarden ("*Van Wyngarden*"). Applicants respectfully traverse these rejections for the reasons stated below.

In order to establish a *prima facie* case of anticipation, all the elements of the claimed invention must be found within a single prior art reference. *Dewey & Almy Chemical Co. v. Mimex*, 124 F.2d 986, 52 USPQ 138 (2d Cir. 1942). Applicants respectfully submit that each and every element of Claims 1-16 is not found within the *Van Wyngarden* reference.

Claim 1 recites:

A method for dynamically constructing a web page, comprising:
 receiving a uniform resource locator identifying a web page, the web page referencing a plurality of elements;
 receiving a user identifier representing a user;
 evaluating each of the plurality of elements based on the user identifier to identify a subset of at least one element the user is authorized to access;
 determining a data conversion specification associated with the user;
 determining a data representation specification associated with the user; and
 converting and presenting each of the subset of elements.

Applicants respectfully submit that *Van Wyngarden* fails to teach, suggest, or disclose each of these elements. For example, *Van Wyngarden* fails to teach, suggest, or disclose "determining a data conversion specification associated with the user" and "determining a data representation specification associated with the user." Instead, the portions of *Van Wyngarden* relied upon by the Examiner disclose determining an IP address associated with a

user identification string. Col. 1, ll. 19-21. An IP address, however, is not a data conversion specification or a data representation specification as recited in Claim 1. Because of this, *Van Wyngarden* fails to teach, suggest, or disclose “determining a data conversion specification associated with the user” or “determining a data representation specification associated with the user.” For at least this reason, the rejection of Claim 1 is improper.

In the Examiner’s Response to Arguments, the Examiner also identified an encryption key used to encrypt information in an authorization ticket as disclosing “a data conversion specification associated with the user” as recited in Claim 1. *See* Office Action, p. 4. The Examiner, however, misinterprets the *Van Wyngarden* reference. An encryption key is not a data conversion specification. Moreover, the encryption key disclosed by *Van Wyngarden* is not even associated with a user (*i.e.*, the client requesting access). Instead, *Van Wyngarden* discloses that the encryption key is derived from the password of the server and used by the authorization mechanism to encrypt information. Col. 1, ll. 58-61. Nothing in *Van Wyngarden* teaches, suggests, or discloses that the encryption key is associated with the user. Because of this, *Van Wyngarden* fails to teach, suggest, or disclose “determining a data conversion specification associated with the user.” For at least this reason, as well, the rejection of Claim 1 is improper.

The Examiner’s Response to Arguments also identified “information required by the client user” as disclosing an example of a “data representation specification” as recited in Claim 1. *See* Office Action, p. 5. Although the Examiner failed to designate as nearly as practicable the particular part of *Van Wyngarden* that is relied upon to reject the pending claims as required by 37 C.F.R. § 1.104(c)(2), Applicants believe Examiner is referring to the “client information required by the server in executing an operation call” disclosed in column 1, lines 49-55 of *Van Wyngarden*. This client information, however, is not a data representation specification as recited in Claim 1. Instead, *Van Wyngarden* merely discloses this client information includes client access rights. Col. 1, ll. 49-55. Nothing in *Van Wyngarden* teaches, suggests, or discloses that this client information includes a data representation specification. Because of this, *Van Wyngarden* fails to teach suggest or disclose “determining a data representation specification associated with the user.” For at least this reason, as well, the rejection of Claim 1 is improper.

Van Wyngarden also fails to teach, suggest, or disclose “converting and presenting each of the subset of elements [the user is authorized to access]” as recited in Claim 1. Instead, the portions of *Van Wyngarden* relied upon by the Examiner merely disclose generating an “authorization ticket” that “provides authorization information for a client requesting access to a server resource in a server.” Col. 1, l. 49 - col. 2, l. 3. Generating an authorization ticket, however, is not converting and presenting each of a subset of elements. Because of this, *Van Wyngarden* fails to teach, suggest, or disclose converting and presenting each of a subset of elements as recited in Claim 1. For at least this reasons, as well as those discussed above, Applicants submit that the rejection of Claim 1 is improper. Therefore, Applicants respectfully request that the rejection of Claim 1 be withdrawn.

Similar to Claim 1, Claim 6 recites “instructions to determine a data conversion specification associated with the user,” “instructions to determine a data representation specification associated with the user,” and “instructions to convert and present each of the subset of elements.” Therefore, Applicants submit that Claim 6 is allowable, for example, for reasons similar to those discussed above with regard to Claim 1. As such, Applicants respectfully request that the rejection of Claim 6 be withdrawn.

Likewise, Claim 11 recites “means for determining a data conversion specification associated with the user,” “means for determining a data representation specification associated with the user,” and “means for converting and presenting each of the subset of elements.” Therefore, Applicants submit that Claim 11 is allowable, for example, for reasons similar to those discussed above with regard to Claims 1 and 6. As such, Applicants respectfully request that the rejection of Claim 11 be withdrawn.

Similarly, Claim 16 recites “computer readable instructions for determining a data conversion specification associated with the user,” “computer readable instructions for determining a data representation specification associated with the user,” and “computer readable instructions for converting and presenting each of the subset of elements.” Therefore, Applicants submit that Claim 16 is allowable, for example, for reasons similar to those discussed above with regard to Claim 1, 6, and 11. As such, Applicants respectfully request that the rejection of Claim 16 be withdrawn.

Claims 2-5, 7-10, and 12-15 depend, either directly or indirectly, from independent Claims 1, 6, and 11, respectively. Therefore, Applicants respectfully submit that Claims 2-5,

7-10, and 12-15 are allowable, for example, for reasons similar to those discussed above with regard to Claims 1, 6, and 11. As such, Applicants respectfully request that the rejections of Claims 2-5, 7-10, and 12-15 be withdrawn.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all pending Claims. If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

Applicants have attached hereto an executed Revocation of Attorney and Appointment of New Attorneys for Non-Provisional Application, with Certificate Under 37 C.F.R. § 3.73(b).

Applicants believe no fees are currently due. However, should there be a fee discrepancy, the Commissioner is hereby authorized to charge said fees or credit any overpayments to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,
BAKER BOTTS L.L.P.
Attorneys for Applicant


Thomas J. Frame
Reg. No. 47,232
Phone: 214-953-6675

Date: October 24, 2005

CORRESPONDENCE ADDRESS:

Customer No.: **05073**
Attorney Docket No. 063170.7005